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9 *Victoria Partners d/b/a*  
10 *Monte Carlo Resort and Casino*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 LISA NEGRELLI, an individual,  
14  
15 Plaintiff,

16 v.

17 MGM RESORTS INTERNATIONAL, d/b/a  
18 MONTE CARLO RESORT AND CASINO;  
19 and CULINARY WORKERS UNION  
20 LOCAL 226; and DOES 1-50, inclusive,  
21 Defendants.

Case No. 2:15-cv-01840-GMN-NJK

**STIPULATION TO: (1) DISMISS  
DEFENDANT MGM RESORTS  
INTERNATIONAL WITH PREJUDICE; (2)  
CORRECT CAPTION AND NAME  
VICTORIA PARTNERS d/b/a MONTE  
CARLO RESORT AND CASINO AS  
DEFENDANT; AND, (3) EXTEND TIME  
FOR DEFENDANTS TO RESPOND TO  
PLAINTIFF'S FIRST AMENDED  
COMPLAINT**

**[First Request]**

22 COMES NOW Defendants Victoria Partners d/b/a Monte Carlo Resort and Casino,  
23 improperly named as "MGM Resorts International, d/b/a Monte Carlo Resort and Casino"  
24 (hereinafter referred to as "Defendant"), Culinary Workers Union Local 226, and Plaintiff Lisa  
25 Negrelli (hereinafter referred to as "Plaintiff"), by and through their respective attorneys, as  
26 follows:

27 IT IS STIPULATED that the Defendant named as "MGM Resorts International d/b/a  
28 Monte Carlo Resort and Casino" shall be dismissed with prejudice from this action and shall be  
stricken from the caption.

IT IS FURTHER STIPULATED that Defendant "Victoria Partners d/b/a Monte Carlo  
Resort and Casino" shall be substituted as the Defendant and that the caption shall be revised to

1 reflect that "Victoria Partners d/b/a Monte Carlo Resort and Casino" is named employer  
2 Defendant in the case.

3 IT IS FURTHER STIPULATED that Defendants Victoria Partners d/b/a Monte Carlo  
4 Resort and Casino and Culinary Workers Union Local 226 shall have seven (7) days from the  
5 date the Court enters this order to answer or otherwise respond to Plaintiff's Complaint.  
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7 This stipulation is submitted and based upon the following:

- 8 1. No Defendants have answered or otherwise responded to Plaintiff's Complaint and  
9 there is good cause for dismissing MGM Resorts International from this action;
- 10 2. There is good cause for correcting the caption and substituting Victoria Partners d/b/a  
11 Monte Carlo Resort and Casino as the Defendant in this action;
- 12 3. That this is the first request to extend time for Defendant to answer or otherwise  
13 respond to Plaintiff's Complaint and there is good cause for the request; and,  
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4. That this request is made in good faith and not for the purpose of delay.

Dated: October 29, 2015

Dated: October 29, 2015

JACKSON LEWIS P.C.

SANTACROCE LAW OFFICES, LTD.

/s/ Paul T. Trimmer

/s/ Frederick A. Santacroce

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*Attorneys for Defendant Culinary Workers  
Union Local 226*

**IT IS SO ORDERED. “MGM Resorts International d/b/a Monte Carlo Resort and Casino” shall be dismissed with prejudice. The Clerk shall revise the caption in this action by deleting “MGM Resorts International, d/b/a Monte Carlo Resort and Casino” and replacing it with “Victoria Partners d/b/a Monte Carlo Resort and Casino.”**

\_\_\_\_\_  
U.S. District Court Judge/U.S. Magistrate Judge

Dated: \_\_\_\_\_